

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

SOUTHERN

DIVISION

APR 23 2015

CLERK
SO. DIST. OF GA

JAMEKA K. EVANS
Plaintiff,

v.

Case No. CV

GEORGIA REGIONAL HOSPITAL AT
Defendant. SAVANNAH

CV 415-103

EMPLOYMENT DISCRIMINATION COMPLAINT

1. Plaintiff resides at: 504 1/2 WEST 36TH ST. UPPER
(Street)
SAVANNAH GA. 31415
(City) (State) (Zip Code)

2. Defendant's name:
CHARLES MOSS, LISA CLARK AND JAMEKIA POWERS

Location of defendant's principal office:

1915 EISENHOWER DRIVE
SAVANNAH, GA 31406

Nature of defendant's business:

MENTAL HEALTH

Approximate number of individuals employed by defendant: OVER 500

3. ☒ This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. § 2000e-5. Equitable and other relief are also brought under 42 U.S.C. § 2000e-5(g).
- ☐ This action is brought pursuant to Age Discrimination in Employment Act of 1967 for employment discrimination based upon age. Jurisdiction is conferred by 29 U.S.C. §§ 626(c)(1) and 626(e), and appropriate relief is also sought.
- ☐ This action is brought pursuant to the Americans with Disabilities Act of 1990, for employment discrimination on the basis of disability. Jurisdiction is conferred by 42 U.S.C. § 12117(a), and appropriate relief is also sought.
4. ☒ I have filed a charge with the Equal Employment Opportunity Commission (EEOC) regarding defendant.
- ☐ I have not filed a charge with the EEOC.
5. ☒ I have received a Notice of Right to Sue letter from the EEOC on 1/23/15.
- ☐ I have not received a Notice of Right to Sue letter from the EEOC.
6. The acts complained of in this suit concern:
- ☐ Failure to hire me
 - ☐ Termination of my employment
 - ☐ Failure to promote me
 - ☐ Demotion

- ☒ Denial of equal pay or work
☐ Sexual harassment
☒ Other (specify) HARASSMENT, PHYSICAL ASSAULT/BATTERY

7. Plaintiff

- ☐ is presently employed by defendant
☒ is not presently employed by defendant

The dates of plaintiff's employment were 8/1/12 - 10/11/13.

The reason(s) for the end of plaintiff's employment by defendant is/are:

- ☐ Plaintiff was discharged.
☐ Plaintiff was laid off.
☒ Plaintiff left the job voluntarily.

8. The conduct of defendant is discriminatory with respect to:

- ☐ my race ☐ my national origin
☐ my religion ☐ my age
☒ my sex ☐ my disability

9. The name, race, sex, and position or title of the individual(s) who allegedly discriminated against me during my period of employment with the defendant company is/are:

Name	Title	Race	Sex
(1) <u>CHARLES MOSS</u>	<u>CHIEF</u>	<u>BLACK</u>	<u>MALE</u>
(2) <u>LISA CLARK</u>	<u>DIRECTOR</u>	<u>WHITE</u>	<u>FEMALE</u>
(3) <u>JAMEKIA POWERS</u>	<u>SR. HR MANAGER</u>	<u>BLACK</u>	<u>FEMALE</u>
(4) _____	_____	_____	_____
(5) _____	_____	_____	_____
(6) _____	_____	_____	_____

10. Describe the discriminatory actions or events that you are complaining of in this lawsuit.

Give factual detail, including names and dates concerning what happened. You do not need to refer to any statutes or cite law.

I WAS TARGETED BY MR. MOSS FOR TERMINATION DUE TO THE FACT THAT I DO NOT CARRY MYSELF IN A TRADITIONAL WOMAN MANNER. I AM A GAY FEMALE, I DO DID NOT BROADCAST MY SEXUALITY. ALTHOUGH, IT IS EVIDENT I IDENTIFY WITH THE MALE GENDER BECAUSE I PRESENTED MYSELF VISUALLY (MALE UNIFORM, LOW MALE HAIRCUT, SHOES, ETC.)

- D) DISCUSSED MY SEXUAL PREFERENCE DURING THEIR CONVERSATION FOR I NEVER MET JAMEKIA POWERS BEFORE THIS HARRASSMENT STARTED, NOR HAVE I DISCUSSED MY SEXUAL PREFERENCE WITH HER.
- E) BEING PUNISHED BECAUSE ~~HER~~ ^{MY} STATUS AS A GAY FEMALE DID NOT CONFORM TO MY DEPARTMENT HEAD'S (CHIEF MOSS) GENDER STEREOTYPES ASSOCIATED WITH WOMEN. THIS CAUSED A GREAT STRAIN ON ME AND CREATED AN HOSTILE WORK ENVIROMENT. CHIEF MOSS ALSO APPOINTED/PROMOTED A LESS QUALIFIED PERSON WITH NO PRIOR SECURITY EXPERIENCE AS MY DIRECT SUPERVISOR

FACTUAL DETAIL (ATTACHMENT)

- 10) ALSO, BY ME GOING TO HR CHIEF MOSS WAS TRYING TO FIND WAYS ~~TO~~ ~~OF~~ TERMINATING ME, THIS IS EVIDENCE OF RETALIATION. THIS INFORMATION IS FROM SGT. HARVEY PEGUE WHO WORKED CLOSELY WITH CHIEF MOSS. EMAILS SENT ~~TO~~ FROM SGT. PEGUE'S SHOWS THAT CHIEF MOSS WAS DETERMINED TO MAKE ~~MY~~ MY EMPLOYMENT UNBEARABLE (EMAIL INCLUDED), MR. MOSS DID EVERYTHING HE COULD TO TERMINATE ME INCLUDING SEVERAL NOTICES. HE WENT AS FAR AS STATING TO SGT. PEGUE OF GETTING RID OF ME BECAUSE I HAD TOO ^{MUCH} INFORMATION OF WRONG-DOING BY HIM IN THE DEPARTMENT. SEE EMAILS DATED MONDAY FEBRUARY 3, 2014.

ON 7/3/16, I WAS STANDING IN THE OFFICE BETWEEN OFFICE AND DOOR. MR. MOSS REPEATEDLY SHUT THE DOOR ON ME WITHOUT GIVING ME THE OPPORTUNITY TO MOVE. THIS IS IN VIOLATION OF THE POLICY # 22-1201 STANDARDS OF CONDUCT AND ETHICS IN GOVERNMENT. TO STRENGTHEN MY CASE, ON OR ABOUT 8/16/2013, I TOOK MY CONCERNS TO LISA CLARK (NOT ONLY SCHEDULING BUT EVERYTHING). THE FACT I RECEIVED A LETTER DATED SEPT. 30, 2013 FROM CHERYL SAUNDERS STATING ALL MY ALLEGATIONS WOULD BE INVESTIGATED, WHEN I SPOKE WITH JAMEKIA POWERS SR. HR MANAGER AND SHE POSED THE QUESTION OF MY SEXUALITY GIVES ME AND OTHERS THE INFERENCE THAT MY SEXUALITY WAS THE BASIS OF HARRASSMENT. I CAN ALSO BE INFERED THAT MR. MOSS AND UPPER MANAGEMENT HAD DISCUSSED THE FACT I AM GAY, AND MR. MOSS DID IN FACT DISCUSS MY SEXUAL PREFERENCE DURING THE INVESTIGATION.

11. The alleged illegal activity took place at:

1915 EISENHOWER DR.		
(Street)		
SAVANNAH	GA.	31406
(City)	(State)	(Zip Code)

12. State what relief you are seeking from the Court. If you are seeking monetary award (back pay or damages), state the amount you are seeking. If you are seeking injunctive relief (an order by the Court) issued against defendant, summarize what should be in the order.

JAMEKA EVANS PRAYS THAT ALL DEFENDANTS BE HELD JOINTLY AND SEVERALLY LIABLE. THAT PROCESS ISSUE AND DEFENDANTS SERVE WITH PROCESS, THAT A JURY TRIAL BE HELD. THAT EACH TORT ALL DEFENDANTS BE HELD LIABLE (DISCRIMINATION, BASED ON MY SEX AS A GAY FEMALE IN VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 AS AMENDED. HARRASSMENT AND RETALIATION FOR SPEAKING WITH HR ABOUT THE TREATMENT I RECEIVED FROM CHARLES MOSS AND FOLLOWING THE CHAIN OF COMMAND. THAT THE AMOUNT OF DAMAGES INCLUDE PUNITIVE DAMAGES IN THE AMOUNT OF \$400,000.00. THAT PLAINTIFF BE AWARDED ALL COST AND EXPENSES OF ~~THE~~ LITIGATION TO INCLUDE ATTORNEY FEES AND ALL OTHER COST THIS HONORABLE COURT DEEMS JUST AND REASONABLE. PLAINTIFF ~~RESERVES~~ RESERVES THE RIGHT TO TO AMEND THIS COMPLAINT AS NEW INFORMATION ARISES.

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint, and that the information contained therein is true and correct. 28 U.S.C. § 1746; 18 U.S.C. § 1621.

4/23/2015
Date

Pamela Evans
Signature of Plaintiff

Plaintiff's Address: 504 1/2 WEST 36TH ST. UPPER UNIT
(Street)
SAVANNAH, GA 31415
(City) (State) (Zip Code)